

**Exhibit W**  
**Affidavit of Linda Stewart**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

EDWIN D. DENNIS, JR.,

Plaintiff,

v.

TOMMY THREAT, et.al

Defendant.

Civil Action No. 3:05-CV-919-T

AFFIDAVIT OF LINDA STEWART

STATE OF ALABAMA

COUNTY OF LEE

BEFORE ME, the undersigned authority and Notary Public in and for said County and State at large, personally appeared LINDA STEWART, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1. My name is Linda Stewart. I am over the age of nineteen and competent to execute this affidavit. I have been employed as a nurse with the Lee County Detention Facility for over four years. I am an L.P.N. and have been licensed for over twenty-years, having served as a nurse in the ICU and CCU in Cobb Hospital Emergency Room for fifteen-years. I taught Nursing Assistance Clinicals for two years at Career Institute. I collected medical information for the law firm of Bellamy and Jones for three years, and I was employed as the personal nurse for Doctor Hoffman, in Phenix City, Alabama, for twelve-years, prior to my coming to the Lee County Detention Facility.


2. I certify and state that the documents from Plaintiff's Medical File provided to the Court which are attached to the Defendants' Special Report are true and correct copies of

inmate records, kept at the Lee County Jail in the regular course of business. I am the Custodian of these Records.

3. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.

  
Linda Stewart

SWORN TO and SUBSCRIBED before me this 10 day of December, 2005.

  
NOTARY PUBLIC  
My Commission Expires: 12/16/2007